

## **EXHIBIT 6**

1 UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE UNITED )  
4 STATES VIRGIN ISLANDS )

5 Plaintiff, )

6 vs. )

7 JPMORGAN CHASE BANK, N.A., )

8 Defendant/Third- )  
9 Party Plaintiff. )

10 JPMORGAN CHASE BANK, N.A. )

11 Third-Party )  
12 Plaintiff, )

13 vs. )

14 JAMES EDWARD STALEY, )

15 Third-Party )  
16 Defendant. )

17 FRIDAY, APRIL 7, 2023

18 CONFIDENTIAL - ATTORNEYS' EYES ONLY

19 - - -

20 Videotaped deposition of Mary  
21 Casey, held at the offices of Boies Schiller  
22 & Flexner, 100 SE 2nd Street, Suite 2800,  
23 Miami, Florida, commencing at 9:23 a.m.  
24 Eastern, on the above date, before Carrie A.  
25 Campbell, Registered Diplomate Reporter,  
Certified Realtime Reporter, Illinois,  
California & Texas Certified Shorthand  
Reporter, Missouri, Kansas, Louisiana & New  
Jersey Certified Court Reporter.

- - -

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1 Q. And in 2003, you were doing a  
2 DDR on the financial trust account, correct?

3 A. I don't know from this arti --  
4 from this e-mail.

5 Q. So if you want to turn to the  
6 article, you'll see it's an article entitled  
7 "The Talented Mr. Epstein," dated March 2003  
8 in Vanity Fair.

9 Correct?

10 A. Correct.

11 Q. And this article, I will  
12 represent you, Ms. Casey, was already  
13 discussed at the deposition of JPMorgan's  
14 corporate rep that happened before your  
15 deposition today.

16 Have you seen this article  
17 before?

18 A. I don't remember this article,  
19 but I see that it's attached to my e-mail.

20 Q. Okay. If you would turn to  
21 page 8 of 22, please.

22 MR. BUTTS: And --

23 THE WITNESS: Do I know that --

24 MR. BUTTS: Yeah, exactly.

25 It's stapled together. It doesn't

1 Sorry.

2 Q. Yes.

3 In May of 2003, you're  
4 referencing a Vanity Fair article as it  
5 relates to information about one of Jeffrey  
6 Epstein's accounts.

7 You will see in March 2003,  
8 there is an article called "The Talented  
9 Mr. Epstein."

10 Do you believe that is the  
11 Vanity Fair article to which you were  
12 referring?

13 A. I don't know.

14 Q. If you would turn to page 8 of  
15 22, please, Ms. Casey, you'll see the big  
16 paragraph that begins "According to."

17 The third line it says,  
18 "Epstein may have good reason to keep his  
19 past cloaked in secrecy. His real mentor, it  
20 might seem, was not Leslie Wexner but Steven  
21 Jude Hoffenberg, 57."

22 Do you see that?

23 A. I do.

24 Q. Do you know who Steven Jude  
25 Hoffenberg is?

1           A.       No.

2           Q.       "He is currently incarcerated  
3   in the federal medical center in Devens,  
4   Massachusetts, serving a 20-year sentence for  
5   bilking investors out of more than  
6   \$450 million in one of the largest Ponzi  
7   schemes in American history."

8                   Do you see that?

9           A.       I do.

10          Q.       And then it goes on and talks  
11   about, "When Epstein met off Hoffenberg in  
12   London in the 1980s, the latter was  
13   charismatic, audacious, head of the Towers  
14   Financial Corporation, a collection agency  
15   that was supposed to buy debts that people  
16   owed to hospitals, banks and phone  
17   companies."

18                   Do you see that?

19          A.       I do.

20          Q.       Are you familiar with Towers  
21   Financial Corporation?

22          A.       No.

23          Q.       If it's the case that in 2003,  
24   Ms. Casey, you had reviewed and forwarded on  
25   this Vanity Fair article with respect to

1 Jeffrey Epstein, would it have caused you to  
2 ask any questions or had any concerns about  
3 representing Jeffrey Epstein?

4 MR. BUTTS: Objection. Form.  
5 You may answer.

6 THE WITNESS: It was a  
7 newspaper article. Or a magazine  
8 article.

9 QUESTIONS BY MS. LIU:

10 Q. It was a newspaper article  
11 discussing the fact that he had worked with  
12 someone who was serving a 20-year sentence  
13 for one of the largest Ponzi schemes in  
14 American history.

15 Would that have created any  
16 concerns for you with respect to your  
17 representation of Jeffrey Epstein as a  
18 client?

19 MR. BUTTS: Objection to form.  
20 You may answer.

21 THE WITNESS: It would be one  
22 data point within many.

23 QUESTIONS BY MS. LIU:

24 Q. Thank you.

25 You're aware, Ms. Casey, that

1 engaged in similar conduct as JPMorgan Chase  
2 and was sanctioned \$150 million for that  
3 conduct?

4 A. I don't know.

5 (Casey Exhibit 34 marked for  
6 identification.)

7 QUESTIONS BY MS. LIU:

8 Q. All right. You're being handed  
9 what was just marked as Exhibit 34. And this  
10 was a due diligence report on JEGE, Inc.

11 Do you see that?

12 A. I do.

13 Q. And just so we can move through  
14 it quickly, I'll represent to you that's one  
15 of, if you don't recall, Jeffrey Epstein's  
16 accounts.

17 Does that name ring a bell?

18 A. It does not.

19 Q. Okay. Well, if you turn to  
20 Bates 7174 --

21 A. Uh-huh.

22 Q. -- you'll see under Comments  
23 the last paragraph says, "Epstein is  
24 well-known to several JPMorgan private bank  
25 employees and to Jes Staley."

1 Do you see that?

2 A. I do.

3 Q. "Mr. Epstein was convicted of a  
4 felony charge in 2008 and is currently  
5 serving an 18-month prison sentence."

6 Do you see that?

7 A. I do.

8 Q. "Jes Staley conferred with  
9 Stephen Cutler, and the decision was made to  
10 keep Mr. Epstein as a private bank client."

11 Do you see that?

12 A. I do.

13 Q. Okay. And then it goes on and  
14 says, "Staley and private bank then decided  
15 that his private bank relationship will be  
16 for banking and custody only. We no longer  
17 provide brokerage execution capabilities for  
18 Mr. Epstein's accounts."

19 Do you see that?

20 A. I do.

21 Q. And instead, Bear Stearns --  
22 which at this point was acquired by JPMorgan,  
23 right?

24 A. This is -- remind me the date  
25 again? This is 2000 --



1 Q. 8.

2 A. I believe this document -- no,  
3 this is 2010, is it not? Hold on.

4 Q. Well, this is while he's  
5 serving his -- okay. So it's -- this is  
6 being written -- I'll withdraw the question  
7 about Bear Stearns. Let's go.

8 A. Yeah, because I don't exactly  
9 know the date that we --

10 Q. Yeah, I really don't have a  
11 question on Bear Stearns.

12 A. Okay.

13 Q. Where is there the rationale  
14 for the decision to continue the relationship  
15 with Jeffrey Epstein?

16 A. If you look in this -- well,  
17 it's both in the -- well, the summary of  
18 findings, if you will, in the middle of  
19 page 7175.

20 Q. Go ahead.

21 A. "Jes Staley conferred with  
22 Stephen Cutler, and the decision was made to  
23 keep Mr. Epstein as a PB client."

24 Q. Well, that tells us that a  
25 decision was made to continue the